

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Bruce Spearman

Case No. Case: 2:21-mj-30449
Assigned To : Unassigned
Assign. Date : 9/23/2021
CMP USA V SPEARMAN (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 13, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
21 USC §§ 841 (a)(1), 846

Offense Description
Possession with intent to distribute a Controlled
Substance

This criminal complaint is based on these facts:
See attached affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 23, 2021

City and state: Detroit, MI



Complainant's signature

TFA Paul Molinik, DEA

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, US Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Paul Molinik, Task Force Agent with the United States Drug Enforcement Administration (DEA), being duly sworn, depose and state the following:

INTRODUCTION

1. Your affiant is a Task Force Agent of the United States Drug Enforcement Administration (DEA) and have been since January 2019, currently assigned to DEA Detroit Group 2. As a result, I am an “investigator or law enforcement officer” within the meaning of 18 U.S.C. § 2510(7). I have been a Border Patrol Agent since May 2006. While with the Border Patrol, I held the position of Border Patrol Agent in El Paso, Texas and Detroit, Michigan. During my time with the Border Patrol, I have held the position of (DISRUPT) Task Force Agent, Detroit, Michigan and have been detailed to the Southeast Michigan High Intensity Drug Trafficking Area (HIDTA) program in Detroit, Michigan as a Border Patrol Intelligence Task Force Agent. In January of 2019, I was assigned as a Border Patrol Intelligence Task Force Agent to DEA Group 2.

2. My official DEA duties include investigating criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846, and 848. I have received special training in the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code. Some of the specialized training I have received includes, but

is not limited to, classroom instruction concerning narcotics smuggling, money laundering investigations, conspiracy, complex investigations, and undercover. I have been involved in various types of undercover assignments, and in various drug investigations utilizing electronic surveillance, including the interception of wire communications, the debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the distribution and transportation of controlled substances, the laundering and concealing of proceeds from drug trafficking and the street gangs who participate in these illegal activities.

3. As a result of these investigative activities, reports. I have conducted and participated in investigations as a DEA Task Force Agent and as a Border Patrol Agent that have resulted in the seizure of marijuana, prescription pills, synthetic drugs, cocaine, methamphetamine, heroin and fentanyl. I am familiar with and have participated in all the normal methods of investigation, including, but not limited to, undercover, visual and video surveillance, questioning of witnesses, controlled deliveries, use of search and arrest warrants, management and use of informants, the installation and monitoring of vehicle tracking devices and electronic intercepts.

4. This affidavit is made in support of a criminal complaint for Bruce SPEARMAN for conspiracy and possession with intent to distribute a controlled

substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1); 846, Possession with Intent to Distribute Controlled substances.

5. Bruce SPEARMAN's criminal history includes offenses:

a) 1997 –Drug Enforcement Administration:

1. Arrested and Charged with Conspiracy to Distribute cocaine.

2. Convicted: 189 months

b) 2000– Federal Corrections - Mckean

1. Arrested and Charged with Conspiracy and Possession with intent to Distribute cocaine

2. Convicted: 5 years

6. This affidavit does not include all the information and evidence gathered during the course of this investigation of SPEARMAN. The following factual information is based on my personal knowledge, the knowledge of DEA Task Force Agents, as well as investigation conducted by other law enforcement entities.

7. On July 13, 2021, at approximately 1:18pm, Michigan State Police (MSP) conducted a traffic stop on Bruce SPEARMAN. At this time, SPEARMAN gave MSP Trooper Pitsch consent to search his vehicle. Found in the vehicle was a Ziploc bag containing 300 grams of fentanyl. While SPEARMAN was detained

during the traffic stop, SPEARMAN revealed to the affiant that he had 25 more grams in a clear baggie tucked in his waistband which was intended for distribution.



8. Following the traffic stop and discovery of narcotics, SPEARMAN was placed under arrest and transferred to the Southfield Police Department for lodging.


CONCLUSION

9. Based on the facts stated above, there is probable cause to believe that Bruce SPEARMAN has committed violations of Title 21, United States Code, Sections 846 and 841(a)(1); 846, Possession with Intent to Distribute Controlled substances.



TFA Paul Molinik
Drug Enforcement Administration

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Kimberly G. Altman
United States Magistrate Judge

Dated: September 23, 2021